

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 1:19-bk-00983-HWV
Daniel N Dickensheets AKA Dan N Dickensheets	:	Chapter 13
Shelly Mae Dickensheets FKA Shelly M Groft, FKA Shelly Keeney, AKA Shelly M Dickensheets, FKA Shelly Mae Groft	:	Judge Henry W. Van Eck
	:	*****
	:	
Debtor(s)	:	
	:	
Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto	:	
Movant	:	
	:	
v.	:	
	:	
Daniel N Dickensheets AKA Dan N Dickensheets	:	
Shelly Mae Dickensheets FKA Shelly M Groft, FKA Shelly Keeney, AKA Shelly M Dickensheets, FKA Shelly Mae Groft	:	
Jack N Zaharopoulos (Trustee)	:	
Respondents	:	

CERTIFICATE OF DEFAULT

Now comes Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto, its successor and assigns (hereinafter, "Creditor") by and through counsel, and certifies to this Court that Daniel N Dickensheets AKA Dan N Dickensheets and Shelly Mae Dickensheets FKA Shelly M Groft, FKA Shelly Keeney, AKA Shelly M Dickensheets, FKA Shelly Mae Groft ("Debtors") have failed to comply with the Order approving the stipulation dated June 8, 2020, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of a Certificate of Default.

19-043559_JDD1

Creditor hereby avers that Debtors are delinquent for the May, 2021 payment and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtors and their Counsel with a Notice of Default on June 8, 2021, allowing Debtors ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)
Sarah E. Barngrover (323972)
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Columbus, OH 43216-5028
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Attorneys for Creditor
The case attorney for this file is Adam B.
Hall.
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Debtor(s)	:	
	:	
Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto	:	
Movant	:	
	:	
v.	:	
	:	
Daniel N Dickensheets AKA Dan N Dickensheets	:	
Shelly Mae Dickensheets FKA Shelly M Groft, FKA Shelly Keeney, AKA Shelly M Dickensheets, FKA Shelly Mae Groft	:	
Jack N Zaharopoulos (Trustee)	:	
Respondents	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos (Trustee), Chapter 13 Trustee, Standing Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA 17036, info@pamd13trustee.com

Gary J Imblum, Attorney for Daniel N Dickensheets and Shelly Mae Dickensheets, Imblum Law Offices, P.C., 4615 Derry Street, Harrisburg, PA 17111, gary.imblum@imblumlaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on June 28, 2021:

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Daniel N Dickensheets AKA Dan N Dickensheets and Shelly Mae Dickensheets FKA Shelly M Groft, FKA Shelly Keeney, AKA Shelly M Dickensheets, FKA Shelly Mae Groft, 1305 York Road, Gettysburg, PA 17325-7513

DATE: 06/28/2021

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Adam B. Hall.

Contact email is abh@manleydeas.com

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